

REMARKS

The Applicant sincerely appreciates the thorough examination of the present application as evidenced by the Office Action of December 30, 2009 (“Office Action”).

In view of the following remarks, reconsideration and withdrawal of the outstanding rejections is respectfully requested.

I. The Rejections of Claims 2-5, 8, 9, 27, 29 and 36

Claims 2-5, 8, 9, 27, 29 and 36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over European Patent Publication No. EP 1096813 to Koskinen et al. (“Koskinen”), in view of U.S. Patent Publication 2005/0041640 to Nasielski et al. (“Nasielski”). Applicant respectfully traverses each of these rejections for at least the reasons set forth below.

A. The Rejection of Claim 2

Independent Claim 2 recites:

A method for a wireless terminal participating in a packet-switched communications session to provide notice of receipt of an incoming circuit-switched call, the method comprising:

receiving a paging request associated with the incoming circuit-switched call; and

notifying a server that establishes and runs the packet-switched communications session that the wireless terminal has received the incoming circuit-switched call,

wherein notifying the server that establishes and runs the packet-switched communications session that the wireless terminal has received the incoming circuit switched call comprises **forwarding a notification message** from the wireless terminal **to the server over a circuit-switched channel.**

In contrast, Koskinen describes a method of “maintaining” data transmission connections that involves sending a mere trinket to the server. *See, e.g.*, Koskinen at ¶ 18. The “messages” described in Koskinen are not used to notify the server that a wireless terminal has received an incoming circuit-switched call—they serve only to reduce the probability that the packet-switched connection will get cut off before the circuit-switched

call is completed. *See* Koskinen at ¶ 11. Koskinen describes a system in which a server automatically severs its packet-switched connection with a given client whenever a certain period of time has elapsed since it last received input from that client. *See, e.g.*, Koskinen at ¶¶ 4 and 5. Thus, Koskinen proposes sending a “message” to the server before switching over to the circuit-switched call, thereby restarting the time-out countdown and extending the time available for the circuit-switched call to be completed without having the packet-switched connection automatically severed:

By applying the method of the invention, it is possible to avoid cutting off of a packet connection particularly in situations in which the request to set up a circuit-switched connection comes right before the moment to transmit a message necessary for maintaining the connection. Thus the circuit-switched connection can be active for a longer time, irrespective of the moment of setting up of the connection. Thus, the probability of cutting off of the packet connection is significantly lower than in solutions of prior art.

Koskinen at ¶ 11.

As noted on page 3 of the Office Action, Koskinen fails to teach or suggest several aspects of the claimed invention: 1) “notifying a server . . . that the wireless terminal has received [an] incoming circuit switched call,” and 2) “forwarding [the] notification message from the wireless terminal to the server over a circuit-switched channel.”

Not only does Koskinen fail to describe “notifying a server . . . that the wireless terminal has received the incoming circuit switched call,” it actually teaches *away* from providing such a notification. Koskinen describes “messages” that convey minimal information—they merely inform the server that a given client was actively engaged in the packet-switched communication session at the time the “message” was sent. This point is highlighted by Koskinen’s discussion of its preferred embodiment:

Before interrupting the packet connection, the wireless terminal MS transmits a message to maintain the packet connection. This can be implemented preferably in such a way that a “No Operation” command, insignificant as such, is transmitted from the wireless terminal to the mobile communication network.

Koskinen at ¶ 18 (emphasis added) (internal abbreviations/citations omitted). Koskinen

makes it very clear that these “messages” are *not* designed to notify the server that the wireless terminal has received an incoming circuit switched call—they merely serve to restart the time-out countdown.

Moreover, Koskinen appears to teach that its “messages” should be sent over a packet-switched channel (*See* Koskinen at ¶ 18), *not* a circuit-switched channel as recited in Independent Claim 2. As mentioned above, Koskinen’s “messages” merely restart the server’s time-out countdown. Because the server’s “clock” simply monitors when the last packet-switched communication was received from a given client (*See, e.g.*, Koskinen at ¶ 4), the most efficient method of restarting the clock is to send a packet-switched “message.” Using a circuit-switched channel would be a far more complex way of restarting the clock—it would require hardware and software changes designed to inform the server that messages sent over a circuit-switched data bearer actually signaled the continued engagement of a packet-switched communication session. And despite all of this additional complexity, using a circuit-switched channel to send Koskinen’s “messages” would provide no additional benefits.

Accordingly, Koskinen not only fails to describe each recitation of Independent Claim 2, it actually teaches away from the claimed invention.

The Office Action relies on Nasielski to remedy the clear defects in Koskinen’s teaching. Yet Nasielski itself fails to teach or suggest “notifying a server . . . that the wireless terminal has received the incoming circuit switched call.” Instead, Nasielski describes a system wherein the wireless terminal *receives* notification of the incoming call from the voice message server (VMS) as opposed to the other way around. *See* Nasielski at ¶¶ 31-32, 36 and 56. The only message sent from the wireless terminal to the VMS is a “reply” indicating whether the user wishes to accept or reject the incoming circuit-switched call. *See* Nasielski at ¶¶ 35, 40 and 57. Moreover, when the wireless terminal sends its reply to the VMS, it has *not yet received* the circuit-switched call—as noted in ¶¶ 35, 41 and 57, the “logical resource connection” supporting the circuit-switched call is not established until *after* the reply is sent from the wireless terminal to the VMS. Thus, for each of these reasons, Nasielski fails to provide any teaching or suggestion that would have led one of ordinary skill in the art to

modify Koskinen so as to add a notification feature as recited in Independent Claim 2.

Moreover, even if the reply sent by the wireless terminal did notify the VMS that the wireless terminal had received an incoming call, the cited references would nevertheless fail to render Claim 2 obvious because Nasielski's VMS is *not* "a server that establishes and runs the packet-switched communications session" as recited in Claim 2. The packet-switched communications sessions described in Nasielski are established and supported *not* by the VMS, but by the packet data serving node (PDSN). *See* Nasielski at ¶ 23; *see also* ¶ 29 ("... using the packet switched session between the [wireless terminal] and the PDSN"). The VMS is merely an ancillary server used to "support various services such as voice mail." Nasielski at ¶ 22. Thus Nasielski fails to overcome the deficiencies of Koskinen for this additional reason.

Furthermore, one of ordinary skill in the art would not have been motivated to combine Koskinen and Nasielski in the first place. This is true for at least three reasons.

First, Nasielski describes using the Short Message System ("SMS") as a means to send content-filled notifications between a wireless terminal and a voice message server. Nasielski at ¶ 57. Unlike the "messages" described in Koskinen, these notifications are designed to convey meaningful information: "The reply generated by the [wireless terminal] **102** may indicate whether the user accepts or rejects the incoming call." *Id.* Yet Koskinen explicitly teaches that such information should *not* be included in its "messages." *See, e.g.,* Koskinen at ¶ 18.

Second, sending Koskinen's "messages" over a circuit-switched channel would be far more complex than simply using a packet-switched connection. As noted above, such a modification would provide no additional benefits despite potentially requiring substantial changes to the system's software *and* hardware.

Third, Nasielski describes a system wherein packet-switched communication sessions are terminated when the user opts to participate in a circuit-switched call—when the user accepts the incoming call the packet-switched session is "released" and a circuit-switched connection is established. *See* Nasielski at ¶¶ 35, 41 and 57. In contrast, Koskinen's "messages" are meant to *reduce* the probability that the packet-switched connection will get

terminated.

For at least these reasons, Applicant respectfully submits that one skilled in the art would not have been motivated to combine Koskinen and Nasielski.

Therefore, because Koskinen neither teaches nor suggests all of the recitations of Independent Claim 2, because Nasielski likewise fails to describe “notifying a server . . . that the wireless terminal has received the incoming circuit switched call,” and because one of ordinary skill in the art would not have been motivated to combine the two references, Applicant respectfully requests reconsideration and withdrawal of the rejection of Independent Claim 2.

B. The Rejections of Claims 3-5, 8 and 9

Claims 3-5, 8 and 9 each depend from Claim 2, and hence are patentable over Koskinen and Nasielski at least by virtue of their depending from a patentable base claim. Additionally, Applicant respectfully submits that at least Claims 8 and 9 are independently patentable over Koskinen in view of Nasielski.

With respect to Claim 8, the Office Action cites Col. 9, lines 41-47 of Koskinen as disclosing “notifying the server that establishes and runs the packet-switched communications session upon termination of the incoming circuit-switched call”. Office Action at 5. Yet the cited passage neither teaches nor suggests “notifying the server . . . upon termination of the incoming circuit-switched call.” Instead, the cited passage expressly states that the only communication sent after the call is terminated is a message from the mobile switching center to the serving GPRS support node. *See* Koskinen, Col. 9, lines 41-47; *see also* Koskinen at Fig. 1B. Thus, no message is sent to the server that establishes and runs the packet-switched communications session. As such, Claim 8 is independently patentable over Koskinen and Nasielski.

Because Koskinen fails to teach or suggest “notifying the server that establishes and runs the packet-switched communications session upon termination of the incoming circuit-switched call” (as recited in Claim 8), it follows that it cannot teach or suggest doing so via a circuit-switched channel (as recited in Claim 9). The Office Action correctly concedes that

Koskinen does not disclose the recitations of Claim 9, but turns to Nasielski to supply the missing teaching. *See* Office Action at 5. For at least the reasons discussed above, Applicant respectfully submits that one skilled in the art would not have been motivated to combine the cited references in the manner suggested, and therefore submits that Claim 9 is independently patentable over Koskinen in view of Nasielski.

C. The Rejection of Claim 27

Independent Claim 27 recites:

A wireless terminal, comprising:
a transceiver;
a packet-switched **suspension notification circuit** coupled to the transceiver that is **configured to generate a notification message that is suitable for transmission as an e-mail message or a text message** over a circuit-switched SMS data bearer **to a server controlling a packet-switched communications session** when the wireless terminal temporarily suspends participation in the packet-switched communications session; and
a circuit-switched communications circuit, wherein the packet-switched suspension notification circuit generates the notification message in response to receipt of a circuit-switched page by the circuit-switched communications circuit.

As noted above with respect to Independent Claim 2, the “messages” described by Koskinen are *not* notification messages—they signal nothing more than the fact that the client was actively engaged with the server at a precise moment in time. As noted by the Examiner on page 6 of the Office Action, such “insignificant” messages (*See* Koskinen at ¶ 18) are not “suitable for transmission as an e-mail message or a text message over a circuit-switched SMS data bearer” (as recited in Claim 27). Indeed, Koskinen’s preferred embodiment appears to transmit its “messages” via a packet-switched connection. *See* Koskinen at ¶ 18.

Although the Office Action asserts that “[i]t would have been obvious . . . to modify the invention of Koskinen and have it include a notification message that is suitable for transmission as a text message over a circuit switched SMS data bearer, as taught by Nasielski” (Office Action at 6), Applicant respectfully submits that one of ordinary skill in the art would *not* have possessed the motivation necessary to make the proposed

modification. As was discussed above with respect to Claim 2-5, 8 and 9, Koskinen actually teaches away from the inclusion of meaningful information in its “messages.” Thus one skilled in the art would have been dissuaded from any modification that led to the generation of a “notification message that is suitable for transmission as an e-mail message or text message.”

Therefore, because the combination of Koskinen and Nasielski neither teaches nor suggests all of the recitations of Claim 27, and because Koskinen teaches away from the use of “notification messages that [are] suitable for transmission as an e-mail message or text message,” Applicant respectfully requests reconsideration and withdrawal of the rejection of Claim 27 as being unpatentable over Koskinen in view of Nasielski.

D. The Rejection of Claim 29

Independent Claim 29 recites:

A computer program product implemented in a wireless terminal that is participating in a packet-switched communications session that provides notice of receipt of an incoming circuit-switched call, comprising:

a computer readable medium having computer readable program code embodied therein, the computer readable program code comprising:

computer readable program code configured to receive a paging request associated with the incoming circuit-switched call;

computer readable program code configured to **notify a server** that establishes and runs the packet-switched communications session **via a text message or an e-mail message** that is transmitted over a circuit-switched SMS data bearer channel **that the wireless terminal has received the incoming circuit-switched call**; and

computer readable program code configured to **notify the server** that establishes and runs the packet-switched communications session over the circuit-switched SMS data bearer channel **upon termination of the incoming circuit-switched call**.

Koskinen does not teach or suggest “notify[ing] a server . . . that the wireless terminal has received [an] incoming circuit-switched call” (see discussion above with respect to Claim 2). Nor does it disclose “notify[ing] the server . . . upon termination of the incoming circuit-switched call” (see discussion above with respect to Claims 8 and 9). Moreover, Koskinen actually teaches away from the use of text messages and e-mail messages (see discussion

above with respect to Claim 27).

Therefore, because Koskinen neither teaches nor suggests all of the recitations of Claim 29, and because Nasielski fails to remedy these clear deficiencies in Koskinen's teaching (see discussion above with respect to Claims 2, 8, 9 and 27), Applicant respectfully requests that the rejection of Claim 29 as being unpatentable over Koskinen in view of Nasielski be reconsidered and withdrawn.

E. The Rejection of Claim 36

Independent Claim 36 recites:

A method for a wireless terminal participating in a packet-switched communications session to provide notice of receipt of an incoming circuit-switched call, the method comprising:

receiving a paging request associated with the incoming circuit-switched call;

notifying a server that establishes and runs the packet-switched communications session **that the wireless terminal has received the incoming circuit-switched call**, wherein notifying the server that establishes and runs the packet-switch communications session that the wireless terminal has received the incoming circuit-switched call comprises forwarding a first notification message from the wireless terminal to the server over a circuit-switched SMS data bearer channel; and

forwarding a second notification message from the wireless terminal **to the server that establishes and runs the packet-switched communications session** via a text message or an e-mail message that is transmitted over the circuit-switched SMS data bearer channel **upon termination of the incoming circuit-switched call**;

wherein the incoming circuit-switched call comprises a circuit-switched call transmitted over a GSM network.

As discussed above with respect to Claims 2, 27 and 29, Koskinen's "messages" do not "notify[] a server . . . that the wireless terminal has received [an] incoming circuit-switched call." Instead, they merely restart the timer that threatens to automatically sever the connection between the server and the client. *See, e.g., Koskinen at ¶ 11.*

Likewise, as was previously discussed with respect to Claims 8 and 9, Koskinen expressly states that the only communication sent after the incoming circuit-switched call is terminated is a message from the mobile switching center to the serving GPRS support node.

See Koskinen at ¶ 25 and Fig. 1B. No message is sent to the server that establishes and runs the packet-switched communications session.

Moreover, as the Office Action concedes, Koskinen fails to teach or suggest both the use of a circuit-switched SMS data bearer, and the forwarding of a notification message via a text message or an email message. Office Action at page 8. Given Koskinen's clear teaching away from the inclusion of meaningful information in its "messages" (see discussion above with respect to Claims 2, 27 and 29), and the fact that Koskinen's preferred "message" appears to be transmitted via a packet-switched channel (see discussion above with respect to Claim 5), Applicant respectfully submits that one skilled in the art would **not** have been motivated to combine Koskinen and Nasielski in the manner suggested by the Office Action.

Finally, even if one of ordinary skill in the art were somehow motivated to combine Koskinen and Nasielski, he/she could not arrive at a method of the claimed invention because Nasielski, like Koskinen, fails to teach or suggest "notifying a server . . . that the wireless terminal has received [an] incoming circuit-switched call" (see discussion above with respect to Claim 2).

Accordingly, Applicant respectfully submits that Claim 36 is patentable over the cited references and requests that the rejection of Claim 36 be reconsidered and withdrawn.

II. The Rejections of Claims 6, 39, and 40

Claims 6, 39 and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Koskinen in view Nasielski, and further in view of U.S. Patent Publication No. 2004/0051900 to Sagiya et al. ("Sagiya"). Applicant respectfully traverses these rejections.

A. The Rejection of Claims 6 and 39

Claims 6 and 39 depend from Claims 2 and 36, respectively, and hence are patentable over the cited references at least by virtue of their depending from a patentable base claim. Additionally, Applicant respectfully submits that Claims 6 and 39 are independently patentable over the cited references for at least the reasons discussed below.

As noted above, Nasielski fails to teach or suggest "notifying a server . . . that the

wireless terminal has received [an] incoming circuit-switched call.” It therefore seems unlikely that one of ordinary skill in the art would have been motivated to combine Koskinen, Nasielski and Sagiya in the manner suggested on page 8 of the Office Action. That is, since neither Koskinen nor Nasielski describe “notifying a server . . . that the wireless terminal has received [an] incoming circuit-switched call,” one skilled in the art would have had no reason to introduce Sagiya’s “Retry After” feature into the hypothetical combination. Accordingly, the rejections of Claims 6 and 39 should be reconsidered and withdrawn.

B. The Rejection of Claim 40

Independent Claim 40 recites:

A method for a wireless terminal participating in a packet-switched communications session to provide notice of receipt of an incoming circuit-switched call, the method comprising:

receiving a paging request associated with the incoming circuit-switched call;

forwarding **a first notification message from the wireless terminal to a server** that establishes and runs the packet-switched communications session over a circuit-switched SMS data bearer channel **that notifies the server that the wireless terminal has suspended the packet-switched communications session**, the first notification message including an identification associated with the wireless terminal and an estimate of the duration of the incoming circuit-switched call;

forwarding **a second notification message from the wireless terminal to the server** that establishes and runs the packet-switched communications session **via a text message or an e-mail message** that is transmitted over the circuit-switched SMS data bearer channel upon termination of the incoming circuit-switched call **that notifies the server that the incoming circuit-switched call has been terminated**; and

resuming the packet-switched communication session after termination of the circuit-switched call;

wherein the incoming circuit-switched call comprises a circuit-switched call transmitted over a GSM network.

Koskinen fails to describe numerous aspects of Claim 40: 1) “a first notification message . . . that notifies the server that the wireless terminal has suspended the packet-switched communications session,” 2) “an estimate of the duration of incoming circuit-

switched call,” 3) “a second notification message . . . that notifies the server that the incoming circuit-switched call has been terminated,” and 4) sending a notification message “via a text message or an e-mail message.”

Applicant respectfully submits that neither of the cited secondary references (either alone or in combination) remedies these defects in Koskinen’s teaching.

Nasielski does not teach a wireless terminal that notifies a server that it has received an incoming call (see discussion above with respect to Claims 2, 29 and 36). Nor does it teach notifying the server that it has suspended a packet-switched communications session. Indeed, when users in Nasielski’s system decide to accept an incoming circuit-switched call, the packet-switched communication session is not suspended, it is “released” so the system can set up the circuit-switched communication session. Nasielski at ¶¶ 35, 41 and 57.

As noted above with respect to Claims 6 and 39, even if Sagiya does describe using “an estimate of the duration of the incoming circuit-switched call” (a point the Applicant does *not* concede), one of ordinary skill in the art would not have been motivated to combine to references because neither Koskinen nor Nasielski describe “notifying a server . . . that the wireless terminal has received [an] incoming circuit-switched call.”

As noted above with respect to Claims 8, 9 and 36, Koskinen neither teaches nor suggests “notifying the server that establishes and runs the packet-switched communications session upon termination of the incoming circuit-switched call.” Nor do either of the secondary references describe sending such a notification.

Finally, as noted above with respect to Claims 27 and 29, Koskinen actually teaches away from sending notification messages “via a text message or an e-mail message.” *See* Koskinen at ¶ 18. Thus one of ordinary skill in the art would have been dissuaded from any modification that led to “forwarding a second notification message from the wireless terminal to the server . . . via a text message or an e-mail message that is transmitted over [a] circuit-switched SMS data bearer channel.”

Applicant therefore respectfully submits that Claim 40 is patentable over the cited references and requests that the rejection of Claim 40 be reconsidered and withdrawn

IV. The Rejections of Claims 31, 32, 34, 37 and 38

Claims 31, 32, 34, 37 and 38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Koskinen in view of Nasielski, and further in view of U.S. Patent Publication No. 2004/0142694 to Levy et al. ("Levy").

A. The Rejection of Claims 31, 32 and 34

Claims 31, 32 and 34 each depend either directly or indirectly from Claim 2, and hence are patentable over the cited references at least by virtue of their depending from a patentable base claim. In addition, Applicant respectfully submits that Claims 31, 32 and 34 are independently patentable over the cited references because one skilled in the art would not be motivated to combine the cited references in the manner suggested by the Office Action.

The Office Action relies upon Levy to supply the teaching necessary to modify Koskinen's method and apply it to a push-to-talk session. Office Action at 10. The Office Action asserts that one skilled in the art would have been motivated to combine Levy with Koskinen and Nasielski "in order to inform users . . . about a service interruption so that they can properly re-establish the session." Office Action at 10. Yet that rationale appears to contradict the teachings of the cited references.

Koskinen's "messages" do not inform the user of anything. According to the preferred embodiment described in paragraph 18 of Koskinen, the user needn't even know a "message" was sent. Applicant therefore respectfully submits that one of ordinary skill in the art would not have been motivated to modify Koskinen in an effort to "inform users . . . about a service interruption."

Accordingly, Applicant respectfully submits that Claims 31, 32 and 34 are independently patentable over the cited references.

B. The Rejection of Claims 37 and 38

Claims 37 and 38 each depend either directly or indirectly from Claim 36, and hence are patentable over the cited references at least by virtue of their depending from a patentable base claim. Additionally, Applicant respectfully submits that Claims 37 and 38 are independently patentable over the cited references.

As a preliminary note, Applicant submits that one skilled in the art would not have been motivated to modify Koskinen in the manner suggested by the Office Action. As discussed above with respect to Claims 31, 32 and 34, the proposed motivation for such a modification (*see* Office Action at 12) appears to contradict the cited references. Moreover, even if one skilled in the art were somehow motivated to combine Koskinen and Levy, he/she could not produce a method of Claim 37 or 38.

Claim 37 recites a method that comprises, among other things, “resuming the push-to-talk session under the existing Packet Data Protocol context after termination of the circuit-switched call.” The Office Action cites Koskinen, column 8, lines 3-7 as disclosing the aforementioned recitation. Office Action at 11. However, the cited passage appears to be wholly unrelated to resuming a push-to-talk session:

This can be implemented preferably in such a way that a “No Operation” command, insignificant as such, is transmitted from the wireless terminal to the mobile communication network.

Koskinen at ¶ 18 (internal abbreviations/citations omitted). The rejection of Claim 37 should therefore be reconsidered and withdrawn.

The method of Claim 37 also comprises “a push-to-talk session, wherein the server that establishes and runs the packet-switched communications maintains a Packet Data Protocol context associated with the push-to-talk session throughout the duration of the circuit-switched call.” The Office Action concedes that Koskinen does not teach or suggest such a method, and relies on Levy to supply the missing teaching. Office Action at 11-12. Levy, however, does not appear to support the Office Action’s assertion.

Levy does not contemplate suspending a push-to-talk session in favor of a circuit-switched call. Rather it is directed at “a method and apparatus for automatically dropping and

reacquiring a [push-to-talk] dispatch channel” (Levy at ¶ 1):

If the signal quality of any dispatch call participant falls below the given threshold, the system alerts all the dispatch call participants thereby avoiding any loss of communications, and tears down the previously set up dispatch call. If the signal quality becomes acceptable again for those [mobile stations] who had previously experienced poor signal quality, they send a message to the system, which automatically sets up a new dispatch call and alerts all the dispatch participants that the dispatch channel can be used again.

Levy at Abstract (emphasis added) (internal figure labels omitted).

Moreover, Levy fails to teach the maintenance of a Packet Data Protocol context associated with a push-to-talk session:

[T]he system maintains information (e.g., participants involved, channel assignments, etc.) on the previously dropped dispatch call for a predetermined period of time referred to as the reestablishment time period, and continues to monitor the [mobile stations] to determine if the [mobile stations] involved in the dispatch call are all above the required signal strength levels. . . .

If the reestablishment time period has not expired [and] it is determined that all of the dispatch call participants have acceptable signal quality, . . . the system control automatically establishes a new dispatch call link and alerts all the dispatch call participants by transmitting a “good channel” alert signal.

Levy at ¶¶ 18 and 19 (emphasis added) (internal figure labels omitted). Automatically dropping an *old* push-to-talk dispatch call and establishing a *new* push-to-talk dispatch call necessarily implies that that server has not “maintain[ed] a Packet Data Protocol context associated with *the* push-to-talk session.”

Accordingly, Levy does not supply the teachings necessary to remedy the clear deficiencies of Koskinen’s teaching. Claim 37 is thus independently patentable over the cited references, as is Claim 38 by virtue of its depending from Claim 37.

Attorney Docket No. 9314-70
Application Serial No. 10/812,700
Filed: March 30, 2004
Page 21

CONCLUSION

Accordingly, the Applicants submit that all pending claims in the present application are in condition for allowance, and a Notice of Allowance is respectfully requested in due course. The Examiner is encouraged to contact the undersigned attorney by telephone should any additional issues need to be addressed.

Respectfully submitted,



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